

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

This Document Relates to:

*Jaylynn Dean v. Uber Techs., Inc.*,  
N.D. Cal. No. 23-cv-06708  
D. Ariz. No. 25-cv-4276

**DECLARATION OF MAYA R. KALONIA IN  
SUPPORT OF PLAINTIFF'S STATEMENT  
REGARDING DEFENDANTS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
REDACTED-FILED UNDER SEAL**

I, Maya R. Kalonia, declare:

1. I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein. I respectfully submit this declaration in support of Plaintiff's Statement in Support of Defendants' Administrative Motion to Consider Whether Another Party's Material Should be Redacted-Filed Under Seal.

2. I have reviewed Exhibits 2 and 3 to the Declaration of Laura Vartain Horn in Support of Uber's Motion to Strike Plaintiff's Witness and Exhibits List filed at ECF Nos. 4672-3 and 4672-4, respectively.

3. Exhibit 2 includes the names of third parties in Plaintiff Dean's case.

4. Exhibit 3 includes the names of plaintiffs proceeding under pseudonym in this litigation. It also includes the names of third parties in Plaintiff Dean's and Plaintiff B.L.'s cases, and the address of a third party in Plaintiff Dean's case.

5. Disclosure of plaintiffs' names in this litigation who are proceeding under pseudonym may result in reputational and economic harm, harassment, and unwanted media attention.

6. Revealing the names and addresses of third parties in this high-profile litigation may result in annoyance and embarrassment.

7. The significant privacy concerns of plaintiffs and third parties outweigh the public's minimal interest in knowing their identities or personal information. The public's interest in the case may be satisfied without revealing this information.

8. There is no less restrictive alternative to sealing portions of the relevant exhibits that would protect the legitimate privacy interests of plaintiffs and third parties, as describing the information would reveal its contents. Plaintiff's request is narrowly tailored to seal only PII.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 22, 2025 in Bethesda, Maryland.

/s/ Maya R. Kalonia

Maya R. Kalonia